

3:21-mj-2196

FILED

DEC 02 2021

Clerk, U. S. District Court  
Eastern District of Tennessee  
At Knoxville

**AFFIDAVIT**

I, Kristopher L. Mynatt, a Task Force Officer (“TFO”) with the Federal Bureau of Investigation (“FBI”), and being duly sworn, depose and state as follows:

**Introduction**

1. I make this affidavit in support of an application for a search warrant under Federal Rule of Criminal Procedure 41 and 18 U.S.C. § 2703(c)(1)(A) for authorization for real-time geolocation data about the location of the a cellular telephone bearing the number 818-941-6955<sup>1</sup>, and believed to be used by Jordon White (J. WHITE), which is hereinafter referred to as the “TARGET TELEPHONE,” which is described herein and in Attachment A, and the location information to be seized is described herein and in Attachment B.

2. Because this warrant seeks the prospective collection of information, including cell-site location information, that may fall within the statutory definitions of information collected by a “pen register” and/or “trap and trace device,” *see* 18 U.S.C. § 3123(3) & (4), the requested warrant is designed to also comply with the Pen Register Act. *See* 18 U.S.C. §§ 3121-3127. The requested warrant therefore includes all the information required to be included in an order pursuant to that statute. *See* 18 U.S.C. § 3123(b)(1).

**Agent Background and Experience**

3. I am an investigative or law enforcement officer of the United States within the meaning of 18 U.S.C. § 2510(7), in that I am empowered by law to conduct investigations of, and to make arrests for, offenses enumerated in 18 U.S.C. § 2516.

4. I have been a TFO with the FBI since 2008. I am also a Detective with the Roane County Sheriff’s Office, where I have worked in law enforcement since joining the Sheriff’s department

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<sup>1</sup> Pursuant to an FBI subpoena served on April 16, 2021, T-Mobile records indicated that 818-941-6955 is subscribed to by Jordon White of 3401 Luwana Lane, Knoxville, Tennessee 37917.

in September of 2007. I have received training in, and conducted numerous investigations into, controlled substance distribution, including heroin, cocaine, methamphetamine, and other illegal narcotics, as well as money laundering. That experience in drug trafficking and money laundering investigations includes working on wiretaps of drug trafficking organizations, traffic stops, search warrant executions, interviewing confidential sources and defendants.

5. Based on my training, experience, discussions with other law enforcement agents, and my participation in other investigations involving controlled substances, I know that drug traffickers commonly use cellular telephones to facilitate their drug trafficking and money laundering activities. Like most everyone else in contemporary society, drug traffickers typically keep their cellular telephones on or near their person around the clock.

6. Providers of cellular services have the ability to provide geolocation information for phones on their network. When this information is made available to law enforcement, investigations of drug trafficking groups are advanced in at least two important ways. Knowing an approximate location of a particular phone greatly facilitates and enhances physical surveillance of the user of that phone and other criminal actors with whom the user associates. Moreover, officers and agents can conduct physical surveillance more conservatively, which helps protect the covert nature of the investigation. Secondly, the availability of geolocation information enables law enforcement to monitor and log the user's movements over time and space. This provides insight into locations commonly visited by the user, which can lead to the identification of other associates, either through their association with known physical locations or by helping law enforcement prioritize and select future physical surveillance locations.

7. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show

merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

8. The Court has jurisdiction to issue the proposed warrant because it is a “court of competent jurisdiction” as defined in 18 U.S.C. § 2711. Specifically, the Court is a District Court of the United States that has jurisdiction over the offense(s) being investigated.

### **Probable Cause**

9. Based on the facts set forth in this affidavit, there is probable cause to believe that violations of 21 U.S.C. §§ 841 and 846, (conspiracy to distribute controlled substances), and 18 U.S.C. § 1956(h) (conspiracy to commit money laundering), have been committed, are being committed, and/or will be committed by J. WHITE and others, known and unknown, as explained below. There is also probable cause to believe that the location information described in Attachment B will constitute evidence of these criminal violations, and/or will lead to the identification of individuals who are engaged in the commission of these offenses.

### **Background**

10. In March 2021, the Knoxville Field Office of the Federal Bureau of Investigation (FBI) initiated an investigation of a local set of the Bloods criminal street gang in Knoxville, Tennessee. The investigation was opened, in part, due to an increase in gang-related violence in Knoxville, Tennessee in 2020 and 2021. To date, FBI agents and TFOs have identified several Blood gang members, and their associates, believed to be trafficking large quantities of controlled substances, specifically marijuana, cocaine, and crystal methamphetamine from locations in California into the Eastern District of Tennessee and elsewhere.

11. Based on training and experience, your Affiant knows that members of criminal street gangs, including the Pacoima Piru set of the Bloods, based in California, participate in unlawful

activities in furtherance of the gang's goals and for monetary gain. Additionally, your Affiant knows that members of criminal street gangs commonly participate in drug trafficking and money laundering activities and utilize firearms in order to protect themselves and their supply of illegal drugs and drug money from rival gangs and others.

12. Your Affiant also knows that criminal street gang members often use social media platforms, including Snapchat<sup>2</sup>, to communicate with their source(s) of supply of illegal drugs, advertise the prices, amounts, and types of controlled substances for sale to their customers, and flaunt their drug trafficking proceeds (e.g., money, clothes, cars, jewelry).

13. During the course of the investigation to date, agents have observed the social media accounts of several Blood gang members, including J. WHITE's social media. Specifically, your Affiant and other law enforcement officers have identified the Snapchat account created by and currently utilized by J. WHITE which he is using to further his criminal conduct. Your Affiant believes that the Snapchat account contains information and evidence of illegal drug trafficking, money laundering, and illegal firearms possession. In or about November/December 2019, law enforcement intercepted a telephone call on a Court authorized Title III wiretap between Bryan Cornelius, a known drug trafficker who is currently indicted in the Eastern District of Tennessee and is awaiting trial, in which J. WHITE proposed becoming a source of supply of illegal drugs for Bryan Cornelius. Based on this conversation, your Affiant believes that J. WHITE has been dealing illegal substances since at least November/December 2019.

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<sup>2</sup> Snapchat is a commonly used social media app that allows users to send messages, pictures, and videos to other "friends" individually or as stories to a wider audience. The Snapchat service is accessed over the Internet via smartphones, tablets, and computers.

14. Your Affiant and other law enforcement officers have determined that J. WHITE is using commercial airlines and parcel/shipping companies to distribute large quantities of marijuana from California into the Eastern District of Tennessee and elsewhere.

15. Snapchat account “valleyboi1612”, which is believed to be utilized by J. WHITE, has a display name of “JH21D.” A search of the Tennessee Offender Management Information System (TOMIS) revealed that J. WHITE was assessed as a confirmed member of the Pacoima Piru Bloods by the Tennessee Department of Corrections (TDOC) on October 20, 2020.

16. In or about October 2011, J. WHITE was convicted of two felony drug charges in Knox County, Tennessee. In or about June 2012, J. WHITE was convicted of a count of Reckless Endangerment – Deadly Weapon Involved in Knox County, Tennessee.

17. On May 6, 2021, agents obtained a federal search warrant ordering Snap, Inc. to provide information/data associated with J. WHITE’s identified Snapchat account “valleyboi1612.”

18. On June 9, 2021, Snap, Inc., pursuant to the aforementioned search warrant, provided your Affiant with information/data associated with Snapchat account “valleyboi1612.”. The information/data associated with the “valleyboi1612” account included subscriber information, messages, records, files, photographs, videos, and other information. Based on the information/data provided by Snap, Inc., your Affiant believes that J. WHITE is utilizing “valleyboi1612” to communicate with his marijuana source(s) of supply and his customers in order to arrange for the sale and distribution of significant quantities of marijuana in the Eastern District of Tennessee and elsewhere.

19. The tables below outline numerous Snapchat text message conversations between “valleyboi1612” and the unknown users of the (Snap, Inc.) Snapchat accounts “realniggasball”, “rebeccahope1998”, “jatorag”, “nigga\_400”, “touchdown865”, and “hbh\_25” between May 10,

2020 and February 17, 2021. The Snapchat text message conversations, pursuant to the aforementioned federal search warrant, were provided to law enforcement by Snap, Inc. Based on the content of the Snapchat text message conversations between “valleyboi1612” and Snapchat accounts “realniggasball”, “rebeccahope1998”, “jatorag”, “nigga\_400”, “touchdown865”, and “hbh\_25”, your Affiant believes that J. WHITE is conspiring with others to sell and distribute large quantities of marijuana to locations within the Eastern District of Tennessee.

realniggasball	valleyboi1612	Cathy Linen6107 Harrison carver rdMaryville%2Ctn 37801Joseph Baker2212 six mile rdMaryville%2Ctn 37803	Sun May 10 23:45:01 UTC 2020
realniggasball	valleyboi1612	2212 six mile rd maryville tn 37803	Wed Jul 15 17:05:11 UTC 2020
valleyboi1612	realniggasball	No	Mon Jul 20 19:42:46 UTC 2020
valleyboi1612	realniggasball	3300 Ashland	Fri Jul 24 15:47:52 UTC 2020
realniggasball	valleyboi1612	3026 limestone dr apt b Louisville tn 37777	Tue Aug 11 17:24:54 UTC 2020
realniggasball	valleyboi1612	3026 limestone dr Apt B Louisville TN 37777	Wed Aug 19 17:42:15 UTC 2020
realniggasball	valleyboi1612	3026 limestone dr Apt B Louisville tn 37777	Sat Nov 07 00:32:30 UTC 2020
realniggasball	valleyboi1612	I had 13.9k but that works either way bro iâ€™ll get it upðŸ’ðŸ’ ¼ just everybody Beatin my tickets right now	Sat Nov 07 03:18:01 UTC 2020
realniggasball	valleyboi1612	All about network maneðŸ’ðŸ’ ¼	Thu Dec 17 18:09:23 UTC 2020
valleyboi1612	realniggasball	1900 for 7 1300 for 3	Tue Dec 22 21:52:56 UTC 2020
realniggasball	valleyboi1612	I got 29.4k	Wed Dec 23 17:52:49 UTC 2020
realniggasball	valleyboi1612	13 x3. 19x7 plus the 12.2k I still owed	Wed Dec 23 17:53:54 UTC 2020
realniggasball	valleyboi1612	3026 limestone dr Apt B Louisville tn 37777	Wed Jan 06 02:40:02 UTC 2021
realniggasball	valleyboi1612	Should be 37%2C900 total	Thu Jan 07 20:03:22 UTC 2021
realniggasball	valleyboi1612	Donnie Linen 6107 Harrison Carver Rd Maryville TN 37801	Wed Jan 27 20:40:39 UTC 2021
realniggasball	valleyboi1612	Devin Lane 6224 Lanier Rd Maryville TN 37801	Wed Jan 27 20:46:07 UTC 2021
valleyboi1612	realniggasball	ðŸ’ðŸ’ðŸ’ðŸ’ ðŸ’ ¼â€”i, ðŸ’ ðŸ’¼ðŸ’¼	Fri Feb 05 14:18:27 UTC 2021





touchdown865	valleyboi1612		Sat Aug 08 05:13:50 UTC 2020
touchdown865	valleyboi1612	Was gonna see what you had to say about it before i moved on it	Sat Aug 08 05:15:19 UTC 2020
touchdown865	valleyboi1612	I filled the xtra slip out saying im forfeiting it and that i dont want it.	Sat Aug 08 15:26:23 UTC 2020
touchdown865	valleyboi1612	I aint sent it or anything yet tho	Sat Aug 08 15:26:32 UTC 2020
touchdown865	valleyboi1612	40.4 wit the 21.5 added to the 18.9	Wed Aug 19 16:17:19 UTC 2020
touchdown865	valleyboi1612		Wed Sep 09 19:47:42 UTC 2020
touchdown865	valleyboi1612		Thu Sep 10 22:06:30 UTC 2020
hbh_25	valleyboi1612	1137 maryville pike Knoxville tn 37920 send it to this one	Wed Jul 29 01:40:09 UTC 2020
hbh_25	valleyboi1612	1137 maryville pike Knoxville tn 37920	Wed Jul 29 21:06:09 UTC 2020
hbh_25	valleyboi1612	1137 maryville pike Knoxville tn 37920	Fri Aug 07 18:51:26 UTC 2020
hbh_25	valleyboi1612	865-283-3755	Wed Feb 17 18:29:22 UTC 2021

20. According to information/data provided by Snap, Inc. pursuant to the aforementioned search warrant, the email address associated with “valleyboi1612” is jordonwhite1612@gmail.com. Your Affiant believes that J. WHITE is the user of the email account associated with the “valleyboi1612” account and that J. WHITE is communicating with subjects via Snapchat text message to distribute significant quantities of marijuana to persons located in the Eastern District of Tennessee and elsewhere. Based on your Affiant’s training and experience, the Snapchat text message conversations exhibited in the tables above are evidence of the illegal distribution of a controlled substance, specifically marijuana. Moreover, the Snapchat text messages between “valleyboi1612” and others, as outlined above, provide addresses believed to be used as locations for marijuana shipments, marijuana prices, and amounts of money owed by customers.

21. The photographs shown below are screenshots taken from images that were uploaded to “valleyboi1612” between May 27, 2021 and July 11, 2021. The images depict phrases and sentences alluding to making money and gang affiliation. Based on your Affiant’s training and experience, and the investigation to date, the messages depicted in Images 1-3 below exhibit the



importance of the relationships for the purpose of trafficking controlled substances.

Additionally, J. WHITE is a known Pacoima Piru Blood gang member who, as depicted in Image 4 below, is willing to “fuck wit” members of other criminal street gangs in order to make money, or “get a bag”. J. WHITE uses “valleyboi1612” to advertise money-making opportunities to others. To date, your Affiant has not obtained any information that suggests J. WHITE has a legitimate source of income. Rather, the investigation to date has revealed that J. WHITE has created a drug trafficking network that consists of individuals who furnish addresses that enable J. WHITE to distribute significant quantities of marijuana from California to the Eastern District of Tennessee and elsewhere by using FedEx, UPS, commercial airlines, and passenger vehicles. According to the photograph depicted in Image 5 below, J. WHITE claims that he is making approximately \$3,000.00 per day. Based on my training and experience, your Affiant believes that J. WHITE’s primary source of income is through the illegal sale and distribution of marijuana, a Schedule I controlled substance.

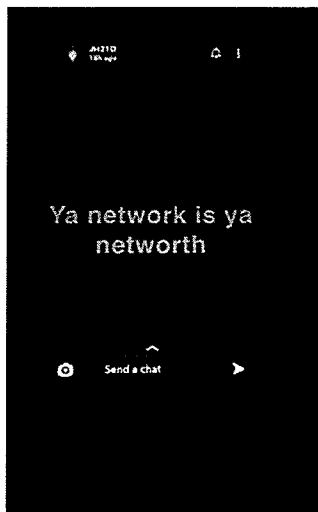


Image 1

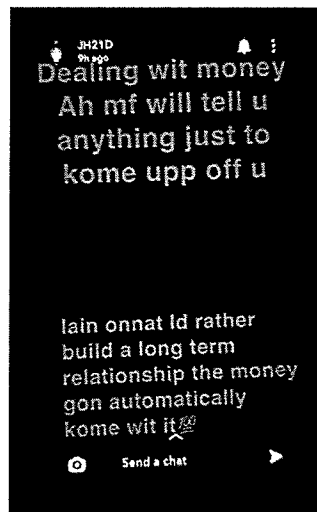


Image 2

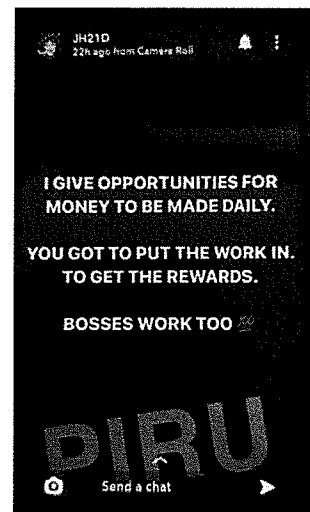


Image 3

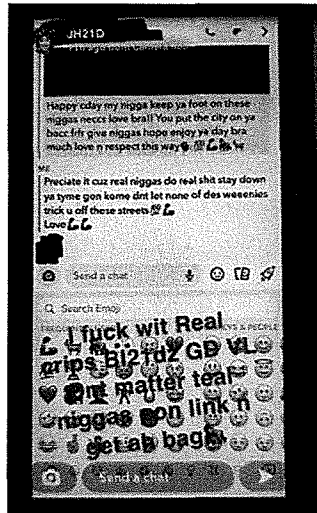


Image 4

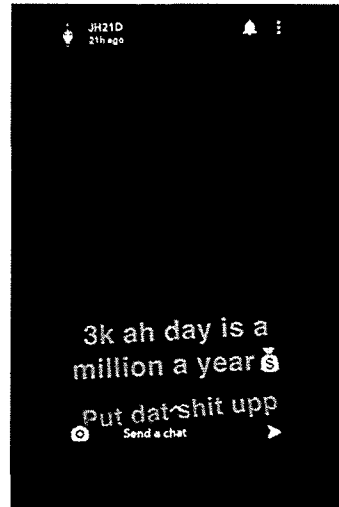


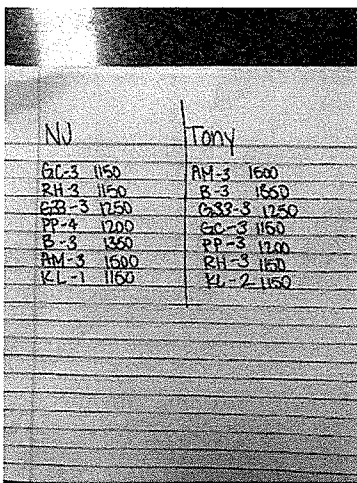
Image 5

22. On July 30, 2021, agents obtained a second federal search warrant ordering Snap, Inc. to provide information/data associated with “valleyboi1612”.

23. On August 10, 2021, Snap, Inc., pursuant to the aforementioned search warrant, provided law enforcement with information/data associated with “valleyboi1612”. The information/data associated with “valleyboi1612” included subscriber information, messages, records, files, photographs, videos, and other information. Based on the information/data provided by Snap, Inc., your Affiant believes that J. WHITE is utilizing “valleyboi1612” to communicate with his marijuana source(s) of supply and his customers in order to arrange for the sale and distribution of significant quantities of marijuana in the Eastern District of Tennessee and elsewhere.

24. The images shown below are digital photographs or screen captures from videos, supplied to your Affiant by Snap, Inc. pursuant to the aforementioned search warrant, which were uploaded to “valleyboi1612” between May 18, 2021 and July 25, 2021. Based on your Affiant’s knowledge, training, and experience, the photographs depicted below are indicative of the sale and distribution of marijuana, a Schedule I controlled substance. Your Affiant believes that “valleyboi1612” has been used, and is currently being used to facilitate the sale and

distribution of marijuana to customers in the Eastern District of Tennessee and elsewhere. The images further illustrate J. WHITE's use of "valleyboi1612" to advertise marijuana prices and the various strains of marijuana that he sells to his customers. J. WHITE also uses "valleyboi1612", exemplified by Images 6-11 portrayed below, as a means to grow his customer base by offering others the opportunity to make money through the sale and distribution of marijuana. Additionally, J. WHITE uses "valleyboi1612" to flaunt his success as a drug trafficker by displaying illicit drug proceeds including large sums of United States currency and diamond-encrusted jewelry.



NJ		Tony	
GC-3	1150	AM-3	1600
RH-3	1150	B-3	1550
EBB-3	1250	CS33-3	1250
PP-4	1200	GC-3	1150
B-3	1350	PP-3	1200
AM-3	1500	RH-3	1500
KL-1	1150	KL-2	1150

Image 6



Image 7

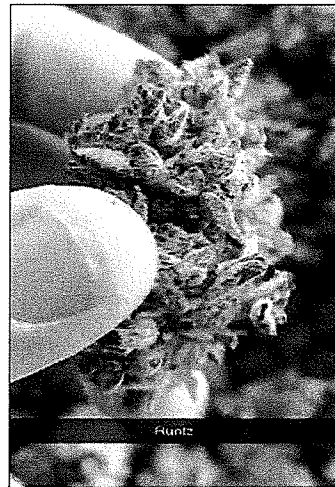


Image 8

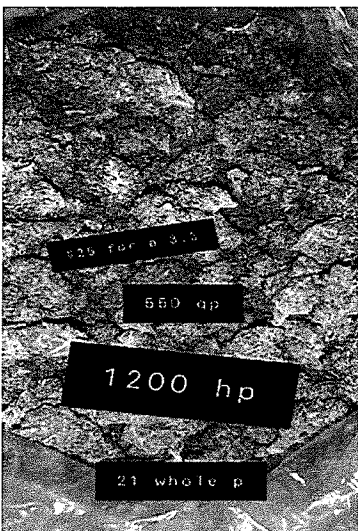


Image 9



Image 10



Image 11

25. On September 7, 2021, agents obtained a third search warrant ordering Snap, Inc. to provide information/data associated with the “valleyboi1612” Snapchat account of J WHITE.

26. On September 15, 2021, Snap, Inc., pursuant to the aforementioned search warrant, provided law enforcement with information/data associated with “valleyboi1612”. The information/data associated “valleyboi1612” included subscriber information, messages, records, files, photographs, videos, and other information. Based on the information/data provided by Snap, Inc., your Affiant believes that J. WHITE is utilizing “valleyboi1612” to communicate with his marijuana source(s) of supply and his customers in order to arrange for the sale and distribution of significant quantities of marijuana in the Eastern District of Tennessee and elsewhere.

27. The following conversation consists of a series of Snapchat messages<sup>3</sup> between the user of “valleyboi1612”, believed to be J. WHITE, and the unknown user of Snapchat account “menace2soci8ty” on September 5, 2021 at approximately 5:21 p.m. (EST).

**valleyboi1612**: We finna get it together

**valleyboi1612**: We go krazi wit mail fa bout a month

**menace2soci8ty**: We gone have to.. I got like 10k 40 bags and like 35-40k out.. and shit been slow I just took all the money I had and brought 20 bags from Raul for 30k

**valleyboi1612**: Dats str8 1500 ah bag sell fa 2k?

**menace2soci8ty**: I been charging certain niggas 2 and sum 2100 but if I wanted to I could charge 2200 easyðŸ”aðŸ” ½

**menace2soci8ty**: Soon as I get a lil 40-50k Iâ€™m spending it everytime I need sum

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<sup>3</sup> The conversation received from Snap Inc. contained the unusual letters, numbers, and other characters that appear in the summary. Nothing was added or removed from the conversation by the Affiant.



money bruh

**valleyboi1612**: Ertyme u get any a money spend it

**menace2soci8ty**: Gotta know thatâ€™s wat Iâ€™m on but it ainâ€™t worth it if it ainâ€™t at least 40k I dnt want no money at all this year I got get at least 250 by New Years ðŸŒŸðŸŒŸ ½â€™ â€™, Iâ€™ really broke out here fr

28. Based on your Affiant's knowledge, training and experience, I believe the above chat thread evidences J. WHITE and the unknown user of Snapchat account "menace2soci8ty" discussing the sale and distribution of marijuana (for example, "40 bags") through the mail ("We go krazi wit mail"), marijuana prices (for example, "30k"), and spending monetary proceeds resulting from the sale of marijuana ("spending it everytime I need sum money bruh"). Additionally, your Affiant knows that drug traffickers are aware that large amounts of U.S. currency deposited in financial institutions are documented and the information can be accessed by law enforcement. Thus, drug traffickers often keep significant amounts of U.S. currency on their person, at their residences, at a "stash-house", or they launder their ill-gotten gains by purchasing assets such as real estate, jewelry, and vehicles.

29. The images shown below are digital photographs or screen captures from videos, supplied to your Affiant by Snap, Inc. pursuant to the aforementioned search warrant, which were uploaded to "valleyboi1612" between September 1, 2021 and September 4, 2021. Based on your Affiant's knowledge, training, and experience, the photographs depicted below are indicative of the sale and distribution of marijuana, a Schedule I controlled substance. Your Affiant believes that "valleyboi1612" has been used, and is currently being used to facilitate the sale and distribution of marijuana to customers in the Eastern District of Tennessee and elsewhere. The images further illustrate J. WHITE'S use of "valleyboi1612" to advertise the

quality and various strains of marijuana that he sells to his customers such as “gelato cake dep”, “ice cream cake”, and “jolly rancher dep”, depicted in Image 13. J. WHITE also uses “valleyboi1612”, exemplified by the images portrayed below, as a means to grow his clientele base by informing both current and perspective customers of the significant quantities of marijuana he is capable of selling during a given transaction. Furthermore, your Affiant believes, as depicted in Image 14, that members of the DTO, including J. WHITE, are using the United States Postal Service (USPS), FedEx, and UPS to ship packages of marijuana from California to Tennessee and elsewhere. Based on the investigation to date, law enforcement agents and officers have discovered that most, if not all, of these shipments of packages containing suspected marijuana are insured and tracked through the parcel services. Image 14, depicted below, consists of a shipping receipt with an origin city of Eugene, Oregon. The words: “Everybody tap in for tracking” are visible in white lettering near the bottom-third portion of the image. Based on your Affiant’s knowledge, training, and experience, the image was sent to from the unknown user of Snapchat account “frostiesempp244” to “valleyboi1612”. Your Affiant knows that drug transactions conducted between suppliers, distributors, and customers of the DTO are sometimes completed using online, peer-to-peer money transfer services and applications. Shipments of significant quantities of marijuana are often insured by the seller/shipper, and tracking numbers are provided to the buyer/customer as proof that the package or product, specifically marijuana, is on its way to a given geographical location.



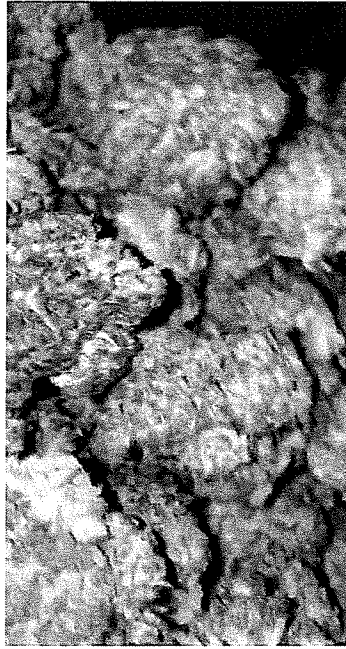


Image 12



Image 13

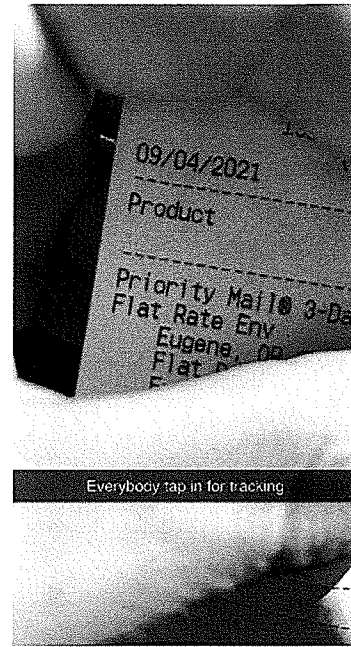


Image 14

30. On January 12, 2021, officers with the Tennessee Department of Corrections Probation and Parole attempted to locate J. WHITE's brother, Isaac White (I. WHITE), at 3401 Luwana Lane, Knoxville, Tennessee<sup>4</sup>, to serve a violation of probation warrant. Officers obtained consent to search the residence for I. WHITE's person from I. WHITE's stepfather, David Whitehead<sup>5</sup> (D. WHITEHEAD), who was present at the residence. Officers observed weapons, and marijuana in plain view during the search for I. WHITE and subsequently obtained a state search warrant for the residence. Approximately thirty pounds of marijuana, \$30,000.00 in cash, and three firearms were seized as a result of the search warrant.

31. On June 7, 2021, Brooklyn Cynthia Cruze (CRUZE) was arrested at the Hartsfield-Jackson Airport in Atlanta, Georgia. CRUZE was found with approximately forty-eight (48) pounds of

<sup>4</sup> I. WHITE listed 3401 Luwana Lane, Knoxville, Tennessee, as his primary residence with Tennessee Probation and Parole.

<sup>5</sup> David Whitehead and Kiersten Whitehead are married and resided at the 3401 Luwana Lane residence at the time of the search warrant. Kiersten Whitehead is J. WHITE's and I. WHITE's mother.

marijuana in her checked baggage on an in-bound flight from Los Angeles, California. As a result of the arrest, CRUZE was transported to the Clayton County Sheriff's Office (CCSO) and detained pending a bond hearing. CRUZE made several recorded jail calls while incarcerated at CCSO. Your Affiant obtained copies of CRUZE's recorded jail calls and reviewed them. On June 8, 2021, CRUZE placed a recorded jail call to (865) 299-8039 and had a conversation with an unknown female subject. During the call, CRUZE referred to the female as "momma" several times. "Momma" asked CRUZE how much marijuana she was arrested with and CRUZE replied that she couldn't talk about it over the phone. CRUZE did request that "momma" call another subject and have that person call "Hood"<sup>6</sup> to get CRUZE an attorney for her case.

32. On March 26, 2021, J. WHITE's brother, Isaac White (I. WHITE), was arrested on multiple Tennessee state warrants as he arrived on a flight from Los Angeles California, to Atlanta Georgia. I. WHITE was extradited to Tennessee and is currently incarcerated in the Knox County Detention Facility (KCDF) in Knoxville, Tennessee. Based on recorded jail conversations, your Affiant knows I. WHITE has contacted J. WHITE from the KCDF on multiple occasions. J. WHITE has utilized the TARGET TELEPHONE during the recorded jail phone conversations with I. WHITE.

33. On September 5, 2021, I. WHITE placed a recorded jail call to his mother, Kiersten Whitehead (K. WHITEHEAD) at 865-973-1255. During the call, K. WHITEHEAD and I. WHITE discuss J. WHITE coming to Knoxville, Tennessee in the near future. K. WHITEHEAD tells I. WHITE that she thinks J. WHITE is coming to get his money and "he's (J. WHITE) just scared to send it with anybody." I. WHITE responded, "I'd be scared to get on a plane with it."

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<sup>6</sup> J. WHITE has a street name of "J-Hood" and is frequently referred to as "Hood" on social media and in other recorded jail calls monitored by your Affiant.

34. On October 2, 2021, Delta Airline's passenger information<sup>7</sup> indicated that J. WHITE traveled from Los Angeles International Airport (LAX) to Hartsfield-Jackson International Airport (ATL) in Atlanta Georgia, and then to McGhee Tyson Airport (TYS) in Knoxville, Tennessee, arriving on October 3, 2021.

35. Based on the facts contained in this Affidavit, your Affiant believes that J. WHITE is currently in Knoxville, Tennessee, with the specific intention of collecting money from his illegal drug distribution with known and unknown co-conspirators in the Eastern District of Tennessee. Your Affiant further believes that the real-time geolocation associated with the TARGET TELEPHONE will assist law enforcement in locating stash houses used for drugs, money, and weapons, and potentially identify co-conspirators assisting J. WHITE in his illegal drug trafficking operation in the Eastern District of Tennessee.

36. In my training and experience, I have learned that many wireless cellular telephone service providers provide cellular telephone access to the general public. I also know that providers of cellular telephone service have technical capabilities that allow them to collect and generate information about the locations of the cellular telephones to which they provide service, including E-911 Phase II data, also known as GPS data or latitude-longitude data and cell-site data, also known as "tower/face information" or cell tower/sector records. E-911 Phase II data provides relatively precise location information about the cellular telephone itself, either via GPS tracking technology built into the phone or by triangulating on the device's signal using data from several of the provider's cell towers. Cell-site data identifies the "cell towers" (*i.e.*, antenna towers covering specific geographic areas) that received a radio signal from the cellular telephone and, in some cases, the "sector" (*i.e.*, faces of the towers) to which the telephone connected. These towers

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<sup>7</sup> Delta Airlines indicated that the reservation was made using the email address jordonwhite1612@gmail.com and the phone number 818-941-6955 (*i.e.*, the TARGET TELEPHONE).

are often a half-mile or more apart, even in urban areas, and can be 10 or more miles apart in rural areas. Furthermore, the tower closest to a wireless device does not necessarily serve every call made to or from that device. Accordingly, cell-site data is typically less precise than E-911 Phase II data.

### **AUTHORIZATION REQUEST**

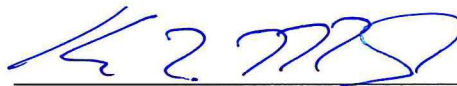
37. Based on the foregoing, I request that the Court issue the proposed search warrant, pursuant to Federal Rule of Criminal Procedure 41 and 18 U.S.C. § 2703(c).

38. This is a long-term investigation of a sophisticated Drug Trafficking Organization believed to be operating in multiple states, involves the use of surveillance, search warrants, and other investigative methods. I do not anticipate that this investigation will be completed in the near future. I therefore request, pursuant to 18 U.S.C. § 3103a(b) and Federal Rule of Criminal Procedure 41(f)(3), that the Court authorize the officer executing the warrant to delay notice until 30 days after the collection authorized by the warrant has been completed. There is reasonable cause to believe that providing immediate notification of the warrant may have an adverse result, as defined in 18 U.S.C. § 2705. Providing immediate notice to the subscriber or user of the TARGET TELEPHONE would seriously jeopardize the ongoing investigation, as such a disclosure would give that person an opportunity to destroy evidence, change patterns of behavior, notify confederates, and flee from prosecution. *See* 18 U.S.C. § 3103a(b)(1). As further specified in Attachment B, which is incorporated into the warrant, the proposed search warrant does not authorize the seizure of any tangible property. *See* 18 U.S.C. § 3103a(b)(2). Moreover, to the extent that the warrant authorizes the seizure of any wire or electronic communication (as defined in 18 U.S.C. § 2510) or any stored wire or electronic information, there is reasonable necessity for the seizure for the reasons set forth above. *See* 18 U.S.C. § 3103a(b)(2).

39. I further request that the Court direct the relevant wireless provider to disclose to the government any information described in Attachment B that is within the possession, custody, or control of the wireless provider. I also request that the Court direct the wireless provider to furnish the government all information, facilities, and technical assistance necessary to accomplish the collection of the information described in Attachment B unobtrusively and with a minimum of interference with the wireless provider's services, including by initiating a signal to determine the location of the TARGET TELEPHONE on the wireless provider's network or with such other reference points as may be reasonably available, and at such intervals and times directed by the government. The government shall reasonably compensate the wireless provider for reasonable expenses incurred in furnishing such facilities or assistance.

40. I further request that the Court authorize execution of the warrant at any time of day or night, owing to the potential need to locate the TARGET TELEPHONE outside of daytime hours.

Respectfully submitted,



Kristopher L. Mynatt  
TFO, FBI

Subscribed and sworn to before me on October 6, 2021



H. BRUCE GUYTON  
UNITED STATES MAGISTRATE JUDGE

**ATTACHMENT A**

**Property to Be Searched**

1. (818) 941-6955, IMSI 312530210611273, IMEI 352851110152030 (“TARGET TELEPHONE”), whose wireless service provider is **SPRINT/T-MOBILE**.
2. Records and information associated with the above TARGET TELEPHONE that is within the possession, custody, or control of the wireless provider, including information about the location of the cellular telephone if it is subsequently assigned a different call number.



## **ATTACHMENT B**

### **Particular Things to be Seized**

#### **I. Information to be Disclosed by the Provider**

All information about the location of the Target Telephone described in Attachment A for a period of 45 days, during all times of day and night. “Information about the location of the Target Telephone” includes all **available** E-911 Phase II data, GPS data, latitude-longitude data, and other precise location information, as well as all data about which “cell towers” (i.e., antenna towers covering specific geographic areas) and “sectors” (i.e., faces of the towers) received a radio signal from the cellular telephone described in Attachment A.

To the extent that the information described in the previous paragraph (hereinafter, “Location Information”) is within the possession, custody, or control of the wireless service provider, the wireless service provider is required to disclose the Location Information to the government. In addition, the wireless service provider must furnish the government all information, facilities, and technical assistance necessary to accomplish the collection of the Location Information unobtrusively and with a minimum of interference with the wireless service provider’s services, including by initiating a signal to determine the location of the Target Telephone on the wireless service provider’s network or with such other reference points as may be reasonably available, and at such intervals and times directed by the government. The government shall compensate the wireless service provider for reasonable expenses incurred in furnishing such facilities or assistance.

This warrant does not authorize the seizure of any tangible property. In approving this warrant, the Court finds reasonable necessity for the seizure of the Location Information. *See* 18 U.S.C. § 3103a(b)(2).

To the extent that the information described in Attachment A is within the possession, custody, or control of the Provider, including any information that has been deleted but is still available to the Provider or that has been preserved pursuant to a request made under 18 U.S.C. § 2703(f), the Provider is required to disclose to the government the following information pertaining to the Account listed in Attachment A for the time period of **April 16, 2021, to the present:**

- a. The following information about the customers or subscribers of the Account:
  - i. Names (including subscriber names, user names, and screen names);
  - ii. Addresses (including mailing addresses, residential addresses, business addresses, and e-mail addresses);
  - iii. Local and long distance telephone connection records;
  - iv. Records of session times and durations, and the temporarily assigned network addresses (such as Internet Protocol (“IP”) addresses) associated with those sessions;
  - v. Length of service (including start date) and types of service utilized;
  - vi. Telephone or instrument numbers (including MAC addresses, Electronic Serial Numbers (“ESN”), Mobile Electronic Identity Numbers (“MEIN”), Mobile Equipment Identifier (“MEID”); Mobile Identification Number (“MIN”), Subscriber Identity Modules (“SIM”), Mobile Subscriber Integrated Services Digital Network Number (“MSISDN”); International Mobile Subscriber Identity Identifiers (“IMSI”), or International Mobile Equipment Identities (“IMEI”);
  - vii. Other subscriber numbers or identities (including the registration Internet Protocol (“IP”) address); and
  - viii. Means and source of payment for such service (including any credit card or bank account number) and billing records.
- b. All records and other information (not including the contents of communications) relating to wire and electronic communications sent or received by the Account, including:

- i. the date and time of the communication, the method of the communication, and the source and destination of the communication (such as the source and destination telephone numbers (call detail records), email addresses, and IP addresses); and
- ii. information regarding the cell tower and antenna face (also known as “sectors”) through which the communications were sent and received.

## **II. Information to be Seized by the Government**

All information described above in Section I that constitutes evidence, fruits, contraband, and instrumentalities of violations of 21 U.S.C. §§ 841(a)(1) and 846 during the period **April 16, 2021, to the present.**

Law enforcement personnel (who may include, in addition to law enforcement officers and agents, attorneys for the government, attorney support staff, agency personnel assisting the government in this investigation and outside technical experts under government control) are authorized to review the records produced by the Provider in order to locate the things particularly described in this Warrant.